

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

MONEC HOLDING AG,	§	
	§	
Plaintiff/Counterclaim Defendant,	§	Civil Action No. 1:09-CV-312
	§	(LMB/JFA)
v.	§	
	§	
APPLE INC.,	§	
	§	
Defendant/Counterclaim Plaintiff	§	
	§	

**SUPPLEMENTAL DECLARATION OF JONI B. REICHER IN SUPPORT OF
DEFENDANT APPLE INC.’S MOTION TO TRANSFER VENUE TO THE
NORTHERN DISTRICT OF CALIFORNIA PURSUANT TO 28 U.S.C. § 1404(a)**

I, Joni B. Reicher, hereby declare:

1. I am employed as a Senior Director in Human Resources at Apple Inc. (“Apple”) in Cupertino, California. I have been employed by Apple since July 2002. I provide this declaration in support of Apple’s motion to transfer this case from the Eastern District of Virginia to the Northern District of California. Unless otherwise indicated below, the statements in this declaration are based upon my personal knowledge or corporate records maintained by Apple in the ordinary course of business.
2. In my original declaration filed on June 19, 2009 in support of Apple’s motion to transfer this case to the Northern District of California, I identified nine Apple employees with potentially relevant knowledge regarding the iPhone or electronic book applications for the iPhone on the App Store.

3. Since the time that I executed that declaration, I understand that Robert Borchers, Apple's Senior Director of iPhone, Worldwide Product Marketing, has left Apple. His last day was July 7, 2009.

4. Mr. Borchers had significant responsibility relating to the marketing strategy for the iPhone, which has been accused of infringement in this case. Accordingly, as of July 8, 2009, Mr. Borchers is a non-party witness with potentially relevant knowledge. I understand that Mr. Borchers continues to reside in the Northern District of California.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 14th day of July, 2009 in Cupertino, California.


Joni B. Reicher